

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of)	
)	
To Coordinate the Power Radio Service,)	
Railroad Radio Service, And Automobile)	RM-10687
Emergency Radio Service Under Part 90)	
of the Commission's Rules Commission's)	
Rules to ITA Informal Request for)	
Certification)	

COMMENTS OF LINCOLN ELECTRIC SYSTEM

The City of Lincoln, Nebraska, d/b/a Lincoln Electric System, hereby submits Comments regarding the "Informal Request of the Industrial Telecommunications Association for Certification to Coordinate the Power Radio Service, Railroad Service, and Auto Emergency Radio Service Under Part 90 of the Commission's Rules" filed by the Industrial Telecommunications Association (ITA) on January 27, 2003. Public notice of the ITA's request was released by the Commission on March 26, 2003.¹

Lincoln Electric System (LES) is a municipal utility that provides electricity to approximately 115,000 customers in a service area that covers about 193 square miles in and around the City of Lincoln and Village of Waverly, Nebraska. LES is a critical infrastructure utility providing generation, transmission and distribution of electrical power within our service area.

¹FCC Public Notice, Report No. 2601, March 26, 2003.

LES utilizes its radio communications system to control our critical infrastructure systems, including power plant operation, transmission and distribution of electricity, system security operations, and other vital functions necessary for the safe, reliable, and efficient delivery of electricity to our customers. The reliability and security of our wireless communications system is essential to support these systems.

LES strongly opposes the ITA's petition to coordinate power, railroad, and automobile emergency radio service below 512 MHz. The United Telecom Council (UTC) has provided this coordination for critical infrastructure entities such as gas, electric, and water for more than 50 years. The UTC has an excellent understanding of the communication needs of critical infrastructure entities, but the ITA does not. By contrast, the ITA has historically coordinated commercial radio frequencies for businesses such as builders and contractors, fruit growers, ready-mix concrete companies, and telephone maintenance.

The ITA has not put forth a compelling reason why the coordination of the frequencies of these two significantly different categories of entities should be commingled. We operate a critical infrastructure and we have serious concern regarding interference problems that could develop due to the ITA's coordination of these entities that share our VHF and UHF frequencies. The ITA has not demonstrated an appreciation for the importance of critical infrastructure communication needs. This is demonstrated by the ITA's openly adverse position to utilities in the 800 MHz public safety interference docket and other proceedings.

UTC has a deep understanding of electrical, gas and water utility telecommunications systems. The UTC also keeps its members informed regarding a number of issues beyond just frequency coordination. With increased attention to Homeland Security issues, now is not the time to make major changes in the way critical infrastructure frequencies are coordinated.

LES' needs are better served by having the UTC continue to provide coordination for these essential services. Adequate frequency spacing and coordination will ensure effective operation of these utility communications systems, particularly in emergency situations.

In conclusion, LES supports retention of the UTC as frequency coordinator for utility frequencies and opposes the petition of the ITA to assume coordination of such utility frequencies.

Respectfully submitted,
Lincoln Electric System

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